



PATRICK W. BEGOS

1055 Washington Boulevard
Stamford, CT 06901-2249
Main (203) 462-7500
Fax (203) 462-7599
pbegos@rc.com
Direct (203) 462-7550

Also admitted in Massachusetts
and New York

February 19, 2025

VIA ECF

Hon. John P. Cronan
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: *McLaughlin v. First Unum Life Ins. Co., et al.*; Case No. 1:24-cv-03082-JPC

Dear Judge Cronan:

This office represents the Defendants, First Unum Life Insurance Company and Provident Life and Casualty Insurance Company (collectively, “Defendants”), in the above referenced matter. Pursuant to Rule 3.B. of Your Honor’s Individual Rules and Practices in Civil Cases, Defendants respectfully request that the briefing scheduling be extended and altered to permit staggered briefing instead of simultaneous briefing by the parties. (Dkt. No. 30). Specifically, Defendants propose the following briefing scheduling:

Document	Current Due Date	Proposed Due Date
Plaintiff’s Opening Brief	February 28, 2025	February 28, 2025
Defendants’ Opening Brief	February 28, 2025	March 21, 2025
Plaintiff’s Opposition/Reply Brief	March 28, 2025	April 11, 2025
Defendants’ Opposition/Reply Brief	March 28, 2025	May 2, 2025

Defendants’ counsel requires additional time to review the administrative record and also has some scheduling conflicts due to vacation schedules. Accordingly, Defendants respectfully request that the briefing schedule be extended and altered accordingly. Plaintiff consents to the relief requested herein, including the change from simultaneous briefing to staggered briefing.

Robinson+Cole

Hon. John P. Cronan, U.S.D.J.
February 19, 2025
Page 2

Please also see attached for a copy of the parties' Stipulation and Proposed Order for Bench Trial on Administrative Record ("Stipulation") that will be filed contemporaneously with this letter-motion. As outlined in the Stipulation, the parties have agreed on the stipulated record in this matter, as well as agreed to file the stipulated record under seal. During the parties' discussions related to the Stipulation, the parties also agreed to the change to staggered briefing in this matter. This is the first such request for an adjournment of the briefing schedule.

Thank you for your consideration of this matter.

Respectfully submitted,



Patrick W. Begos

cc: All Counsel of Record (*via* ECF)

Enclosure

The request to modify the briefing schedule is granted. Plaintiff's Opening Brief is due by February 28, 2025 and Plaintiff's Opposition/Reply Brief is due by April 11, 2025. Defendants' Opening Brief is due by March 21, 2025 and Defendants' Opposition/Reply Brief is due by May 2, 2025. The Clerk of Court is respectfully directed to close Docket Number 34.

SO ORDERED.
Date: February 20, 2025
New York, New York



JOHN P. CRONAN
United States District Judge